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PM/DTCC -- BLUE LANTERN COORDINATOR MROMERO

E.O. 12958: N/A

TAGS: [ETTC](#) [KOMC](#) [TH](#)

SUBJECT: BLUE LANTERN LEVEL 3: PRE-LICENSE END-USE CHECK  
ON LICENSE 05-050020252

REF: SECSTATE 198159

¶1. According to the website maintained by the Thai Ministry of Commerce, Department of Business Development ([www.dbd.go.th](http://www.dbd.go.th)), Erawan Firearms Ltd, Partnership is listed as follows:

Registration No. 0103510012525  
Registered Date: 13 Sept 1967  
Name: The Erawan Firearms Ltd., Part.  
Capital Registration: 5, 500,000 Baht  
Business Partners: Mr. Kulbeepal Singh Sachdev, Mr. Amornthep Sachdev, Mr. Veerathep Sachdev, Mr. Uthain Sachdev  
Manager of the Limited Partnership is Mr. Uthain Sachdev  
Location: 2/9, 2/10 Bureapha Road, Wang Burapha Phirom Sub-District, Phra Nakhon District, Bangkok  
The business submitted financial reports for 1999-2005  
Purpose of company is to import, wholesale, and retail sale guns and ammunition.

¶2. According to the Telephone Directory, Erawan Firearms is listed and has a phone number as outlined in reftel and an address at 2/9-2/10 Burapha Road, Wang Burapha Phirom Sub-District, Phra Nakhon District, Bangkok.

¶3. On December 19, PolFSN made an unannounced visit to the business where he met Mr. Kulbeepal Singh Sachdev, a Thai national and one of the business owners. The business is located on the ground floor of a concrete shopping plaza. Mr. Kulbeepal and his three sons showed PolFSN around the business and answered the following questions:

Can you confirm the order of rifles under license 05-050020252?

Yes. Mr. Kulbeepal presented three permits for importation of firearms issued by the Department of Provincial Administration numbered 829/2549, 830/2549, and 831/2549 dated September 15, 2006 and valid until September 17, 2007. The information in the permits corresponded with the information contained in reftel.

One discrepancy was noted, the original licensee in the permits was listed as "the National Firearms Ltd., Part.:" which is a sister shop of Erawan and managed by Mr. Veerathep Sachdev. National Firearms has authorized Erawan to order this lot of weapons on its behalf. The authorization was approved by the Department of Provincial Administration.

Mr. Kulbeepal also presented a copy of Erawan's Purchase Orders No. E49905, E49906, and E49907, all dated October 9, 2006 and signed by Mr. Kulbeepal, to the RSR Group Inc. to purchase the weapons specified in reftel.

The document referenced in reftel (described as a Government of Thailand Permit to Order or Import Firearms) was not recognized by Mr. Kulbeepal. He had no copy of that document and said it did not relate to the purchase of weapons outlined in reftel.

National Firearms Ltd. Partnership is listed in the Commerce Ministry website as:

Registration Number 0103506001778  
Registered Date: 8 March 1963  
Capital Registration: 850,000 baht  
Business Partners: Mr. Inder Singh Sachdev, Mr. Kulbeepal Singh Sachdev, Mr. Veerathep Sachdev, Mr. Uthain Sachdev. Mr. Veerathep Sachdev is named as the manager.  
Location is 35 Sasong Road, Wt Ratchabophit Sub-District, Phra Nakhon District, Bangkok.  
The business has submitted financial reports from 1999-2006.

Who will be the specific end-users of these high-caliber rifles?  
Wealthy clients or gun collectors. On rare occasions, these types of weapons are sold to government officials.

Is it legal for private citizens to own high-caliber rifles?  
They are not prohibited by law or listed on the Thai list of prohibited weapons. The weapons can only be sold to persons with permits issued by the Department of Provincial Administration.

Where will the rifles be stored prior to sale?  
In a storage room at Erawan. The room is concrete with reinforced 3-4 mm iron sheets covering the walls. The shop itself has iron sheets on all walls except the front (which has a large glass window). There are three medium-sized safes inside the storage room to contain the weapons. The storage room itself is locked.

The shop has CCTV and guards posted inside and out. The shops front window does not have bars.

Can you confirm the security of all items in inventory?  
Yes. Mr. Kulbeepal presented a gun inventory in a large ledger containing the types, manufacturers serial numbers and Thai registration numbers of the weapons together with the purchasers' names and personal data. Officials from the Department of Provincial Administration inspect the inventory periodically.

How long has Erawan been in business and who are its principal officers?

The company has been in business since 1967, is family run as outlined in the registration documents. Erawan has two sister firearms shops managed by the same family members: the aforementioned National Firearms Ltd. and Sahathep International Ltd., Partnership. It also owns 11 gun shop licenses and gun shops located in Chainet, Prachuap Khirikhan, Lopburi and Loei provinces.

Who are the regular customers and where do they reside?  
Most clients live in Bangkok, some live up country. They are made up of the general Thai public, civil servants and law enforcement officers with permits issued by the Department of Provincial Administration.

Are the owners familiar with the restrictions governing the import of U.S.-origin defense articles, in particular, the prohibition against unauthorized re-export?

Yes. Thai law also prohibits any gun shop from re-exporting imported weapons.

14. PolFSN also visited the Ministry of Interior's Department of Provincial Administration and met with Chief Kittiphong Yot-aphikun to discuss the case. Kittiphong confirmed Erawan

is a licensed and bona fide importer/retailer of firearms with permit number 25/2549 issued on April 27, 2006 and valid until April 26, 2007.

Kittiphong provided copies of three permits to import firearms issued to National Firearms Ltd. numbered 829/2549, 830/2549 and 831/2549 dated September 15, 2006 and valid until September 14, 2007 corresponding to the information contained in reftel. Kittiphong had a record of National Firearms authorizing Erawan to order the lot of weapons on its behalf.

According to Interior Ministerial Regulation No 11 (B.E. 2522-1979) issued under the authority of the Firearm, Ammunition, Explosive Articles, Fireworks and Firearm Imitation Article Act of 1947, Thai nationals may purchase rifles of not more than 20 mm. Mr. Kittiphong and his staff told PolFSN that they routinely issued permits to Thai nationals wishing to purchase rifles similar to those outlined in reftel. The most common use for the weapons is hunting.

Post has no derogatory information related to Erawan.  
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